

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, DC 20268

RECEIVED

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In the Matter of:

Conception Jct., MO.  
Post Office State

64434  
ZIP Code

Received Docket No. A 201205  
POSTAL REGULATORY COMMISSION  
OFFICE OF THE SECRETARY

NOV 07 2011

Richard Holtman, Petitioner Office of: PAGR

## PARTICIPANT STATEMENT

1. Petitioner(s) are appealing the Postal Service's Final Determination concerning the Conception Jct. post office. The Final Determination was posted Sep. 1 2011  
(date)

2. In accordance with applicable law, 39 U.S.C. § 404(d)(5), the Petitioner(s) request the Postal Regulatory Commission to review the Postal Service's determination on the basis of the record before the Postal Service in the making of the determination.

3. Petitioners: Please set out below the reasons why you believe the Postal Service's Final Determination should be reversed and returned to the Postal Service for further consideration. (See pages of the Instructions for an outline of the kinds of reasons the law requires us to consider.) Please be as specific as possible. Please continue on additional paper if you need more space and attach the additional page(s) to this form.

See Attached papers.

We believe the Postal Service's Final Determination to close the Conception Junction Post Office should be reversed and returned to the Postal Service for further consideration for the following reasons:

1. The Postal Service has not taken into consideration how this closing will affect this community, even trying to shut it down prematurely by posting & distributing letters of a November 5 closure date on the day after the PRC had posted Docket #A2012-5 to appeal on their website. They have rushed through this entire process without taking into consideration how this rural community will be affected. In addition to a cutback in service from a post office in the community to all-rural delivery, the community will also suffer from a lack of funds for the all-volunteer fire department serving the community through the lease of the post office building. The only response to this fact from the Postal Service has been that another lessee could be found. However, the post office building was built in 1967 by the Tri-C Fire Department, solely for the purpose of housing the post office in this community. To dismiss this concern so lightly, especially during a time of slow economic growth due to the recession, shows a total lack of consideration for the effect on this rural community's fire protection. The Tri-C Fire Department has been jilted by the Postal Service!
2. The premature letter announcing the November 5 closure date informed the PO Box customers to erect mailboxes or obtain a PO Box at Conception Post Office or face the possibility of their mail being returned to sender. The rules governing the closing of a post office clearly states that "Postal Service should not require customers to erect mailboxes until after the PRC renders its opinion." For this reason alone, it should be reversed, as the Postal Service did not follow its own guidelines for closing a post office. The letters placed in the PO boxes were dated October 6, 2011, and the PRC website had posted Docket #A2012-5 on October 5, 2011.
3. The Postal Service did not provide a complete official record for customer viewing during the Final Determination posting. The official record that was at the office during the 60-day period was twice as thick as the one that was in the office during the 30-day Final Determination posting. When I looked at it, I could not find a copy of the comment form that I had filled out during the 60-day period. There were also no copies of all the questionnaires filled out by customers. There were summary pages of these comments and concerns, but the copy was so small and blurry that it could not be read. Once again, the Postal Service did not follow its own guidelines for closing a post office by not providing the complete official record for customers to view. In addition, what was provided was not legible in certain parts---the parts that pertained to customers' concerns!
4. The Postal Service will not be providing a maximum degree of effective and regular postal services to this rural area for reasons stated in the original appeal letter, but also because of another matter that has come to my attention. Currently, several customers are receiving The Maryville Daily Forum newspaper on the same day as those in Maryville receive their newspaper. However, I've been told that the

Stanberry rural routes have a one-day delay on their Maryville papers, receiving them the day after the Conception Junction rural route receives their paper. If the Conception Junction mail is re-routed to Stanberry, then that most likely will mean a one-day delay on The Maryville Daily Forum newspapers. That is not what one would consider a maximum degree of effective and regular postal service! That is a decrease in service, going from receiving a daily newspaper on the day it is published to the day after. The Postal Service has not adequately addressed this concern for those customers who subscribe to The Maryville Daily Forum. It could even cause a decrease in circulation for The Maryville Daily Forum if customers decide they do not want to subscribe to a newspaper with 'old' news, that is, a newspaper that is a day late in arriving due to the Postal Service decision to close this office.

5. The fact remains that the Postal Service is prevented from closing a small post office solely for operating at a deficit. Is it not also a fact that most post offices operate at a deficit, especially in these difficult economic times? According to the Postal Service, the workload has declined at the Conception Junction Post Office. There are news items about the decline in first-class mail, so wouldn't it follow that there would be a decline in workload at this office, and every other office around the country? Therefore, the facts in the Postal Service's final determination may be true, but they do not prove what the Postal Service says they prove because the decline in workload is across the board, not just in Conception Junction! It could possibly make a case for a cutback in hours, but not to close an office in a rural community that relies on the post office to serve its citizens in a way that is a necessity for a rural area like ours. As citizens of the United States, we are entitled to the same services as urban America.

Richard Holtman

10-31-11



**10/06/2011**

**To: Conception Jct Post Office Box Customers**

**Effective the close of Business 11/05/2011 the Conception Jct Post Office will close and you will go to street delivery. If you would like to continue to receive your mail to a PO Box, you may rent one at Conception MO Post Office or another Post Office of your choice.**

**The administrative office over the route is the Stanberry Post Office. You will need to contact the postmaster at Stanberry to find out where to put your mail box and to get your 911 street address before the post office closes.**

**You can see the OIC at Conception Jct before 11/05/2011 to get a pro-rated refund on your box rent. You will need to complete a change of address at this time to your new address.**

**Customers who have not put in a change of address by 11/5/2011 will have their mailed held at the Stanberry Post Office for 10 days. After 11/15/2011, mail will be returned which has no forwarding address on file.**

**District Discontinuance Coordinator  
Mid-America PFC  
300 W Pershing Rd Suite 210  
Kansas City, MO 64108-9000**

## Analysis of 60-Day Posting Comments

## Number of comments returned

Total questionnaires distributed

11

Favorable comments

11

Unfavorable comments

0

No opinion expressed

0

Total comments returned

11

## Postal Concerns

The following postal concerns were expressed:

## 1. Concern (Unfavorable)

Customer suggested reducing/diminishing the number of hours the post office operates

## Response

Hours are determined by the workload in the post office

## 2. Concern (Unfavorable)

Customers asked why their Post Office was being discontinued while others were retained

## Response

Post Offices are reviewed on a case-by-case basis. When there is a vacancy in a main office, it is typically to conduct a survey of the business activity and determine the feasibility of providing service by alternate means.

## 3. Concern (Unfavorable)

Customers expressed concern about collection of outgoing mail

## Response

The collection box will be emptied and all mail will continue to be picked up. When the temporary Saturday collection box is added, customers may place outgoing mail in their mailbox to be collected and dispatched by the carrier.

## 4. Concern (Unfavorable)

Customers had a concern whether winter road conditions might impede delivery

## Response

Both winter weather and heavy mail volume can cause deviations from the normal delivery schedule. However, the carrier is required to provide a sufficient number of adequate and equipped vehicles and personnel (drivers or subcontractors, warning lights or signs, etc.) to ensure the carrier safely and efficiently and in accordance with federal, state, and local motor vehicle laws and regulations.

## 5. Concern (Unfavorable)

Customers were concerned about a possible address change

## Response

Customers will be assigned a first address. The new address will continue to use the existing city, town, and ZIP Code. Mail will be forwarded in accordance with postal regulations. Changes of address forms are available online at [www.usps.com](http://www.usps.com) or from the Postal Service to assist customers in notifying destinations of the change.

## 6. Concern (Unfavorable)

Customers were concerned about amount of mail to be delivered by First Class.

## Response

The top priority of the Postal Service is to provide mail service in the most efficient manner possible because all of our costs are reflected in postage rates customers must pay. Delivery costs are one of the biggest expenses, so you can be assured that careful thought is given to the structure of each rate. A customer's location on a carrier's route of travel directly affects the time it takes mail to be delivered. This process, therefore, provides early delivery of mail to every customer because, no matter how we structure a route, somebody must be last. We do, however, carefully consider the volume of mail for each route so that we can deliver the greatest amount of mail at the earliest possible hour. With the largest fleet of delivery vehicles in the world, to minimize vehicle and fuel expenses, we must also pay special attention to energy conservation measures. When the price of gas rises, we pay one cent per gallon for the gasoline and more than \$1 million. Therefore, when structuring a route, we must balance the goal to deliver as much mail as possible as early as possible with the need to minimize the total distance a mail carrier must cover. We do begin the information to customers who would like to deliver business early mail delivery. If a local customer is other than a delivery service, such as First Class, has a service that provides service to their mail carrier and throughout the day.

## 7. Concern (Unfavorable)

Customers were concerned about having to travel to another Post Office for service

## Response

Services provided at the Post Office will be available from the carrier. First-class mail will continue to be delivered to another Post Office for delivery. Most transactions do not require meeting the carrier at the mailbox. Initiated by Mail and Money Order, Electronic forms are available for customer convenience. Services are also available at many stores and gas stations where customers may already stop. Office at [www.usps.com](http://www.usps.com) or by calling 1-800-537-8762.

## 8. Concern (Unfavorable)

Customers were concerned about obtaining Express Mail service from the carrier

## Response

The Postal Service provides all the services that are available at the Post Office with the exception of Priority Mail service and bulk mail acceptance. This includes stamp sales, package pick up, special services and money order sales. You may call the Administrative Office for Express Mail for assistance. The First-Class carrier will deliver Mail Express and may call the local carrier and second letters, flats or packages up to 13 ounces for mailing. The carrier will deliver the mail and provide a receipt for any money received. On the following delivery day the carrier will provide change or a bill for the amount due the customer. Packages over 13 ounces may be picked up if the postage was printed online or with a trackable meter.

## 9. Concern (Unfavorable)

Customers were concerned about obtaining service from the carrier

## Response

The Postal Service provides all the services that are available at the Post Office with the exception of Priority Mail service and bulk mail acceptance. This includes stamp sales, package pick up, special services and money order sales.

## 10. Concern (Unfavorable)

No Concern

## Response

## Nonpostal Concerns

The following nonpostal concerns were expressed:

## 1. Concern (Unfavorable)

Customers expressed concern for loss of community identity

## Response

A community identity derives from the character and way of life residents and their use of its name. The Postal Service is helping to preserve community identity by continuing the use of the Community Name and ZIP Code in addresses.

3. **Concern (Unfavorable)**  
Customers felt the loss of a Post Office would have a detrimental effect on the business community.  
**Response**  
Questionnaire responses revealed that customers will continue to use local businesses if the Post Office is discontinued. The current letter could increase the loss of revenue by having another carrier system to deliver the local community.  
3. **Concern (Unfavorable)**  
Customers felt the loss of a Post Office would have a detrimental effect on the business community.  
**Response**  
The Postal Service is required to provide both satisfactory and regular and effective service during its mail and related mail services. The proposed alternative delivery service will limit the delivery and mail services of the community in a more cost-effective manner. Businesses generally require regular and effective postal services and these will always be provided to the community. Questionnaire responses revealed that customers will continue to use local businesses if the Post Office is discontinued. The current letter could increase the loss of revenue by seeking other alternatives to deliver mail to the local community.  
4. **Concern (Unfavorable)**  
Customers were concerned about loss of employment in the community.  
**Response**  
All delivery-related positions were located in conjunction of the reorganization efforts. The BRC is a non-profit organization that provides services and that the employees a small number of employees at another office in the metropolitan area after the mail delivery to the Postal Service.